

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

RAMON MODESTO,

Plaintiff,

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC #: \_\_\_\_\_  
DATE FILED: 7/6/15

15-CV-0495 (RA) (KNF)

-against-

HECTOR FIGUEROA, PRES. OF SEIU 32BJ  
et. al.

Defendants,

X-----X

**NOTICE OF MOTION**  
**MOTION FOR EXTENSION**  
**OF TIME TO FILE RESPONSE**  
**TO MOTION TO DISMISS**

**PLEASE TAKE NOTICE** that upon the annexed affirmation of RAMON MODESTO, affirmed on July 3, 2015, plaintiff will move this Court, before KEVIN NATHANIEL FOX, United States Magistrate Judge for an order pursuant to the Federal Rules of Civil Procedure granting plaintiff's motion for extension of time to file response to defendants Arbitrators of 32BJ motion to dismiss.

**I declare under the penalty of perjury that the foregoing is true and correct.**

Dated: Woodside, New York  
July 3, 2015

*Ramon Modesto*

Ramon Modesto  
4029 67 St. 2F  
Woodside, New York 11377  
Tel. 718-431-5226

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

RAMON MODESTO,

Plaintiff,

15-CV-0495 (RA) (KNF)

-against-

**AFFIRMATION IN  
SUPPORT OF MOTION**

HECTOR FIGUEROA, PRES. OF SEIU 32BJ,  
et.al.

Defendants,

X-----X

I, RAMON MODESTO, affirm under penalty of perjury that:

1. I, RAMON MODESTO, am the plaintiff in the above-entitled action, and respectfully move this Court to issue an order granting plaintiff's motion for extension of time to file response to defendants Arbitrators of 32BJ.
2. The reason why I am entitled to the relief I seek is that plaintiff is an ordinary layman, a new immigrant unlearned in the practice and intricacies of the law. He needs more time in order to seek legal advise and research in order to file a responsive pleading to the motion to dismiss filed by defendants Arbitrators of 32BJ. Plaintiff is filing Pro Se.

**WHEREFORE**, I respectfully request that the Court grant this motion, as well as such other and further relief as may be just and proper.

**I declare under the penalty of perjury that the foregoing is true and correct.**

Dated: Woodside, New York  
July 3, 2015

*Ramon Modesto*  
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4029 67 St 2F  
Woodside, New York 11377  
Tel. no. 718-431-5226